

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

ZEXI LI

Plaintiff/Moving Party

and

CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING and
JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5,
JOHN DOE 6, JOHN DOE 7, JOHN DOE 8, JOHN DOE 9, JOHN DOE 10,
JOHN DOE 11, JOHN DOE 12, JOHN DOE 13, JOHN DOE 14, JOHN DOE 15,
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JOHN DOE 51, JOHN DOE 52, JOHN DOE 53, JOHN DOE 54, JOHN DOE 55,
JOHN DOE 56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60

Defendants/Responding Parties

Proceeding under the *Class Proceedings Act, 1992*

**FRESH AS AMENDED NOTICE OF MOTION
(MAREVA INJUNCTION)**

The Plaintiffs will make a Motion, without notice, to a Judge of the Ontario Superior Court of Justice on Thursday, February 17, 2022 at 10:00 a.m. or as soon after that time as the Motion can be heard.

PROPOSED METHOD OF HEARING: The Motion is to be heard orally by Zoom videoconference.

THE MOTION IS FOR

- (a) An Order in the form attached as Schedule “A” (the “**Draft Order**”) granting an interim and interlocutory *Mareva* injunction in respect of the corporate Defendant, Freedom 2022 Human Rights and Freedoms (“**Freedom 2022**”) and the individual Defendants, Patrick King, Tamara Lich, Christopher Garrah, Nicholas St. Louis, and Benjamin Dichter (collectively, the “**Individual Mareva Respondents**” and together with Freedom 2022, the “**Mareva Respondents**”) from dissipating certain assets as identified in the Draft Order;
- (b) An Order abridging the time for service and filing of any materials relied on in support of this Motion;
- (c) An Order providing that service of any Order issued and any materials relied on in respect of this Motion shall be made in accordance with paragraph 15 of the Draft Order;
- (d) Such further and other relief as counsel may request and to this Honourable Court may seem just.

THE GROUNDS FOR THE MOTION ARE

2. This is a proposed class proceeding. The representative Plaintiffs seek the above relief against particular Defendants, the Mareva Respondents, in order to secure some prospect of recovering for the damages they and the proposed class members have incurred and continue to incur as a result of the actions of the Mareva Respondents in the ongoing Freedom Convoy protest.

Background

3. There are three proposed representative Plaintiffs: (1) Zexi Li, a 21-year-old University of Ottawa student and representative of the Resident Subclass; (2) Happy Goat Coffee Company Inc, an Ottawa business that owns and operates several coffee kiosks and café locations, some of which are in the “Occupation Zone” and representative of the Business Class; (3) Union: Local 613, an Ottawa business that operates a restaurant within the “Occupation Zone” and an additional representative of the Business Class, and (4) Geoffrey Devaney, a restaurant worker who works as an employee, and representative of the Employee Class.

4. The claims as articulated in the Plaintiffs’ Fresh as Amended Claim (the “**Amended Claim**”) include claims on behalf of a proposed class that includes three subclasses:

- (a) A proposed sub-class of residents who reside in the zone occupied by the Freedom Convoy protestors (the “**Resident Class Subclass**”);
- (b) A proposed class of businesses who operate in the zone occupied by the Freedom Convoy protestors and who have experienced business losses as a result of the Freedom Convoy protest (the “**Business Subclass**”); and
- (c) A proposed class of employees who work as employees in the zone occupied by the Freedom Convoy protestors and have lost wages as a result of the Freedom Convoy protest (the “**Employee Subclass**”).

5. The Defendants in the action are:

- (a) A corporate Defendant called Freedom 2022 Human Rights and Freedoms (“**Freedom 2022**”). The stated purpose of Freedom 2022 is “Advocacy against government.”
- (b) Several individual named Defendants including:
 - (i) The directors of Freedom 2022,
 - (ii) The organizers, leaders, or spokespeople of the Freedom Convoy protest,
 - (iii) Individuals involved in Freedom Convoy’s fundraising efforts or who otherwise have control over assets being used to facilitate the Freedom Convoy protest; and
- (c) Sixty-two John and Jane Does, who are the drivers of semi-tractor trucks or trailer trucks parked downtown in the Ottawa core, who have been idling continuously and blasting horns as a form of protest, or who are funding the Freedom Convoy protest through donations with the knowledge that the Freedom Convoy participants are acting unlawfully.

6. For the duration of the now three-week Freedom Convoy protest, the Defendants have, among other things:

- (a) Persisted in using vehicle horns and causing significant noise-related disturbances to the Plaintiffs and proposed class members (now in defiance of the Honking Injunction);

- (b) Occupied the roads and sidewalks of downtown Ottawa with idling vehicles and semi-permanent encampments;
 - (c) Polluted the air with diesel fumes from hundreds of idling vehicles and carried jerry cans of fuel to enable the vehicles to continue idling;
 - (d) Blocked access to sidewalks and roadways while being loud and aggressive demonstrators; and
 - (e) Set up port-a-potties, free food and drink stations, makeshift outdoor kitchens and firepits and performance spaces, all in downtown Ottawa.
7. The damages claimed against the Defendants in the Plaintiffs' Amended Claim are:
- (a) On behalf of the Resident Subclass, general damages for private nuisance and public nuisance, in the amount of \$36 million for pain and suffering and psychological distress;
 - (b) On behalf of the Business Subclass, special damages for private nuisance and public nuisance, in the amount of \$200 million for business losses;
 - (c) On behalf of the Employee Subclass, special damages for private nuisance and public nuisance, in the amount of \$60 million for loss of wages; and
 - (d) Punitive damages in the amount of \$10 million.

Mareva Injunction

8. A *Mareva* injunction against the specific assets of the Mareva Respondents is warranted and necessary in the circumstances of this case.

9. The Plaintiffs and proposed class members have a strong *prima facie* case against the Mareva Respondents.

10. The Plaintiffs and proposed class members will suffer irreparable harm if the relief is not granted. There is an immediate and substantial risk that any assets which may be used to satisfy judgment on behalf of the Plaintiffs and proposed class members, who have been directly harmed by the Mareva Respondents' conduct, will be dissipated and put beyond the reach of this Court.

11. The balance of convenience favours granting the Orders.

12. The relief sought on this motion is not sought as against all Defendants. It is sought only against the Mareva Respondents – a subset of Defendants who:

- (a) have engaged in and are continuing to engage in the tortious conduct described in the Amended Claim;
- (b) currently hold or have held assets that are being used to perpetrate the tortious conduct described in the Amended Claim; and
- (c) have demonstrated an intention to dissipate those assets in a manner that would put them beyond the reach of this Court.

13. Even with respect to this narrow group of Defendants, the Plaintiffs on this motion do not seek to freeze all of the Mareva Respondents' personal assets. Instead, the Plaintiffs seek only to freeze those assets held by the Mareva Respondents which are being used or which are intended to be used to further the tortious conduct described in the Amended Claim.

14. This Court has jurisdiction over each of the Mareva Respondents.

15. The Plaintiffs are representative plaintiffs in a class action, who are acting in the public interest, and may not be in a financial position to honour undertaking with respect to damages arising from the relief sought on this motion. As a result, no undertaking as to damages should be required in the circumstances of this case.

Substituted Service

16. The exact current locations and email addresses of several of the Mareva Respondents are currently unknown. However, all of the individual Mareva Respondents are presently in Ottawa and are therefore unlikely to receive any materials mailed to their home addresses. As a result, to the extent necessary, the Plaintiff seeks an order permitting substituted service of the Order sought and materials filed on this Motion in accordance with paragraph 15 of the Draft Order.

17. The Plaintiffs rely on the following authorities in support of this motion:

- (a) Rules 1.04, 1.05, 2.01, 2.03, 3.02, 16.04, 37.07(2), 37.17, and 40 of the *Rules of Civil Procedure*;
- (b) Section 101 of the *Courts of Justice Act*;
- (c) Such further and other grounds as the lawyers may advise.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the Motion:

- (a) The evidence contained in the Plaintiff's Motion Record on this Motion for a Mareva Injunction dated February 15, 2022 including:
 - (i) The Affidavit of Zexi Li sworn/affirmed February 14, 2022;
 - (ii) The Affidavit of Jeremy King sworn/affirmed February 15, 2022;

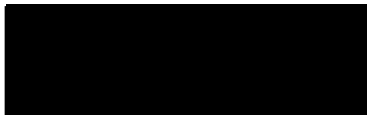
- (iii) The Affidavit of Richard Sanders sworn February 15, 2022;
- (b) The evidence contained in the Plaintiffs' Supplemental Motion Record on this Motion for a Mareva Injunction dated February 16, 2022 including:
 - (i) The Affidavit of Ivan Gedz sworn/affirmed February 16, 2022;
 - (ii) The Affidavit of Jeremy King sworn/affirmed February 16, 2022;
 - (iii) The Affidavit of Richard Sanders sworn/affirmed February 16, 2022;
- (c) The evidence contained in the Plaintiff's Motion Record on the Motion for an Interlocutory Injunction dated February 4, 2022 including:
 - (i) The Affidavit of Zexi Li sworn/affirmed February 4, 2022;
 - (ii) The Affidavit of Trent Baur sworn/affirmed February 4, 2022;
 - (iii) The Affidavit of Dr. Nita Scherer sworn/affirmed February 4, 2022;
- (d) The evidence contained in the Plaintiff's Supplementary Motion Record on the Motion for an Interlocutory Injunction dated February 6, 2022, including:
 - (i) The Affidavit of Sean Flynn sworn/affirmed February 6, 2022;
- (e) The evidence contained in the Responding Motion Record on the Motion for an Interlocutory Injunction dated February 6, 2022, including:
 - (i) The Affidavit of Tamara Lich, dated February 5, 2022;
 - (ii) The Affidavit of Joseph Andre Christian Gagne, dated February 5, 2022;

- (iii) The Affidavit of Daniel Bulford, dated February 5, 2022;
- (iv) The Affidavit of Neil Joseph Judes McKinney, dated February 5, 2022;
- (v) The Affidavit of Stephane Raynaud, dated February 6, 2022;
- (f) The evidence contained in the Supplementary Responding Motion Record on the Motion for an Interlocutory Injunction dated February 7, 2022, including:
 - (i) The Affidavit of Cathy Gendron sworn/affirmed February 6, 2022;
 - (ii) The Affidavit of Mike Gendron sworn/affirmed February 6, 2022;
 - (iii) The Affidavit of Monique Campeau-LeBlanc sworn/affirmed February 6, 2022;
 - (iv) The Affidavit of My Tu Kaan sworn/affirmed February 6, 2022;
 - (v) The Affidavit of Richard Musca sworn/affirmed February 6, 2022;
 - (vi) The Affidavit of Wilfrid Leblanc sworn/affirmed February 6;
 - (vii) The Affidavit of Benjamin Dichter sworn/affirmed February 7, 2022;
 - (viii) The Affidavit of Chris Barber sworn/affirmed February 7;
- (g) The evidence contained in the Plaintiffs' Motion Record on the Motion to extend the Interlocutory Injunction dated February 16, 2022, including:
 - (i) The Affidavit of Zexi Li sworn/affirmed February 13, 2022;

- (ii) The Affidavit of Sean Flynn sworn/affirmed February 14, 2022;
- (iii) The Affidavit of Trudy Moore sworn/affirmed February 15, 2022;
- (iv) The Affidavit of Jeremy King sworn/affirmed February 15, 2022; and,
- (h) Such further and other evidence as the lawyers may advise and this Honourable Court may permit.

February 16, 2022

**LENCZNER SLAGHT ROYCE
SMITH GRIFFIN LLP**
Barristers



Monique L. Jilesen (43092W)



Madison Robins (70110K)



Sarah Bittman (74913I)



Acting as Agent to Champ & Associates, Counsel
for the Plaintiff, Zexi Li

SCHEDULE "A"

Court File No. CV-22-00088514-00CP

ONTARIO SUPERIOR COURT OF JUSTICE

THE HONOURABLE
JUSTICE

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THURSDAY, THE 17th
DAY OF FEBRUARY, 2022

B E T W E E N:

(Court Seal)

ZEXI LI

Plaintiff

and

CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING and
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JOHN DOE 56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60

Defendants

Proceeding under the *Class Proceedings Act, 1992*

ORDER (MAREVA INJUNCTION)

NOTICE

If you, the Defendant, disobey this order you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized. You are entitled

to apply on at least twenty-four (24) hours notice to the Plaintiff, for an order granting you sufficient funds for ordinary living expenses and legal advice and representation.

Any other person who knows of this order and does anything which helps or permits the Defendant to breach the terms of this Order may also be held to be in contempt of court and may be fined or imprisoned.

THIS MOTION, made without notice by the Plaintiffs, Zexi Li, Happy Goat Coffee Company Inc., 7983794 CANADA INC. (c.o.b. UNION: LOCAL 613), on their own behalf and on behalf of the proposed class as defined in the Fresh as Amended Statement of Claim to be issued, for an interim and interlocutory Order in the form of a *Mareva* injunction restraining the corporate Defendant, Freedom 2022 Human Rights and Freedoms (“**Freedom 2022**”), as well as the individual Defendants Patrick King, Tamara Lich, Christopher Garrah, Nicholas St. Louis, and Benjamin Dichter (collectively, the “**Individual Mareva Respondents**” and together with Freedom 2022, the “**Mareva Respondents**”) from dissipating the assets identified in Schedule “A” to this Order and other relief, was heard this day by Zoom videoconference.

ON READING the Motion Record of the Plaintiffs dated February 15, 2022 (Mareva Injunction), the Supplementary Motion Record of the Plaintiffs dated February 16, 2022 (Mareva Injunction), the Motion Record of the Plaintiff dated February 4, 2022 (Interlocutory Injunction), the Supplementary Motion Record of the Plaintiff dated February 6, 2022 (Interlocutory Injunction), the Responding Motion Record dated February 6, 2022 (Interlocutory Injunction), the Supplementary Responding Motion Record dated February 6, 2022 (Interlocutory Injunction), and the Motion Record of the Plaintiff dated February 16, 2022 (Extension of Interlocutory Injunction), as well as the Factum of the Plaintiff dated February 16, 2022 (“**Motion Materials**”);

AND ON HEARING the submissions of counsel for the Plaintiffs;

1. **THIS COURT ORDERS** that the time for service and filing of the Motion Materials is hereby abridged, such that this motion is properly returnable today.

Mareva Injunction

2. **THIS COURT ORDERS** that the Mareva Respondents and their servants, employees, agents, assigns, officers, directors and anyone else acting on their behalf or in conjunction with any of them, and any and all persons with notice of this Order, are restrained from directly or indirectly, by any means whatsoever:

- (a) selling, removing, dissipating, alienating, transferring, assigning, encumbering, or similarly dealing with the assets of the Mareva Respondents listed in Schedule “A”
 - (b) instructing, requesting, counselling, demanding, or encouraging any other person to conduct themselves contrary to paragraph 2(a) above; and
 - (c) facilitating, assisting in, aiding, abetting, or participating in any acts the effect of which is to contrary to paragraph 2(a) above,
- until final disposition of this action or further Order of this Court.

3. **THIS COURT ORDERS** that paragraph 2 applies to all of the assets listed in Schedule “A” to this Order, whether or not they are in the Mareva Respondents’ own names, whether or not they are solely or jointly owned, and whether or not the Mareva Respondents have exclusive control over the asset. For the purpose of this Order, a Mareva Respondent’s assets include any asset which he or she has the power, directly or indirectly, to dispose of or deal with as if it were

his or her own. The Mareva Respondent is to be regarded as having such power if a third party holds or controls the assets in accordance with his or her direct or indirect instructions.

4. **THIS COURT ORDERS** that if the total value free of charges or other securities of the assets listed in Schedule “A” to this Order exceeds \$20 million, the Mareva Respondents may sell, remove, dissipate, alienate, transfer, assign, encumber, or similarly deal with them so long as the total unencumbered value of the Mareva Respondent’s frozen assets remains above \$20 million.

Undertaking as to Damages

5. **THIS COURT ORDERS** that the requirement in Rule 40.03 of the *Rules of Civil Procedure* for the moving party to provide an undertaking as to damages potentially arising from the granting and enforcing of this Order is hereby dispensed with.

Ordinary Living Expenses

6. **THIS COURT ORDERS** that any Mareva Respondent may apply for an order, on at least twenty-four (24) hours notice to the Plaintiffs, specifying the amount of funds which the Mareva Respondent requires from the assets listed in Schedule “A” to this Order to spend on ordinary living expenses and legal advice and representation.

Disclosure of Information

7. **THIS COURT ORDERS** that each Mareva Respondent shall prepare and provide to the Plaintiffs, within 7 days of the date of service of this Order, a sworn statement describing the nature, value, and location of his or her assets worldwide, whether in his own name or not and whether solely or jointly owned, which are being used, have been earmarked for, or are intended to be used to fund, directly or indirectly, activities associated with the Freedom Convoy protests

in or around the City of Ottawa, Ontario, Canada which began on or about January 29, 2022 worldwide, including but not limited to any digital assets (and any associated cryptocurrency wallet addresses).

8. **THIS COURT ORDERS** that each Mareva Respondent shall submit to an examination under oath within 7 days of the delivery by the Mareva Respondent of the aforementioned sworn statement referred to in paragraph 7.

9. **THIS COURT ORDERS** that if the provision of any of the information set out in paragraph 7 is likely to incriminate the Mareva Respondent, he or she may be entitled to refuse to provide it, but is recommended to take legal advice before refusing to provide the information. Wrongful refusal to provide the information referred to in paragraph 7 is contempt of court and may render the Mareva Respondent liable to be imprisoned, fined, or have his or her assets seized.

Intermediaries

10. **THIS COURT ORDERS** that the entities listed in Schedule “B” as well as any banks, financial institutions, money service businesses, fundraising platforms or websites, cryptocurrency exchanges or platforms, or custodians of any cryptocurrency wallets, (collectively, the “**Intermediaries**”) shall, upon being provided with notice of this Order, forthwith freeze and otherwise prevent any removal, dissipation, alienation, transfer, assignment, encumbrance, transaction, or similar dealing with any of the assets identified in Schedule “A” to this Order.

11. **THIS COURT ORDERS** that the Intermediaries shall forthwith disclose and deliver up to the Plaintiffs any and all records held by the Intermediary concerning the Mareva

Respondents' assets, including the existence, nature, value and location of any monies or assets or credit, wherever situate, held on behalf of the Mareva Respondent by the Intermediaries.

Alternative Payment of Security into Court

12. **THIS COURT ORDERS** that this Order will cease to have effect if the Mareva Respondents provide security by collectively paying the sum of \$20 million into Court, and the Accountant of the Superior Court of Justice is hereby directed to accept such payment.

Variation, Discharge or Extension of Order

13. **THIS COURT ORDERS** that anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order, on four (4) days' notice to the Plaintiffs.

14. **THIS COURT ORDERS** that the Plaintiffs shall apply for an extension of this Order on or before February 28, 2022, failing which this Order will terminate.

Service of this Order

15. **THIS COURT ORDERS** that service of this Order and the Motion Materials shall be made on the Mareva Respondents through at least one of the following means, as applicable:

- (a) On the corporate Mareva Respondent, Freedom 2022, by delivering a copy to Alan G. Warnock, counsel for Freedom 2022 as indicated on its corporate filings;
- (b) On the Mareva Respondent, Tamara Lich, by delivering a copy to her legal counsel, Keith Wilson of the Justice Centre for Constitutional Freedoms;
- (c) On the Mareva Respondent, Benjamin Dichter, by delivering a copy to his legal counsel, Keith Wilson of the Justice Centre for Constitutional Freedoms;

- (d) On the Mareva Respondent, Patrick King, by delivering a copy to his email address at [REDACTED] and through social media to Mr. King's Facebook page at <https://www.facebook.com/therealpatking>;
- (e) On the Mareva Respondent, Christopher Garrah, by delivering a copy to his email address at [REDACTED] and through social media to Mr. Garrah's Facebook page at www.facebook.com/chris.garrah.31;
- (f) On the Mareva Respondent, Nicholas St. Louis, by delivering a copy through social media to Mr. St. Louis's Twitter account, @NobodyCaribou;

and that such service shall be deemed valid and effective upon the earlier of (a) confirmation of receipt of the Order and Motion Materials or (b) 24 hours from the time the Order and Motion Materials are sent in accordance with paragraphs 18(a) to (f) above.

16. **THIS COURT ORDERS** that this Order is and shall be immediately in effect upon issuance regardless of whether it has been formally entered.

SCHEDULE "A"

Freedom 2022 Human Rights and Freedoms

1. Any and all assets of Freedom 2022 Human Rights and Freedoms, including but not limited to any and all funds donated through GiveSendGo LLC or any of its affiliates or payment processors, where such funds were raised in connection with the "Freedom Convoy 2022" fundraiser and are held in a bank account(s) owned or controlled by or for the benefit of Freedom 2022 Human Rights and Freedoms.

Patrick King

2. Any and all funds held in the bank account of or controlled by Patrick King located at ATB Financial (a.k.a. Alberta Treasury Branches).
3. Any and all funds, digital assets, and or cryptocurrency held in bank accounts and/or digital wallets generated or raised in connection with transactions of Freedom Convoy Token (\$FCT).

Tamara Lich

4. Any and all funds held in the bank account of or controlled by Tamara Lich into which she is receiving etransfers by way of the email address

1. 6-9999@ [REDACTED]

Chris Garrah

5. Any and all funds held in the bank account of or controlled by Chris Garrah into which he is receiving funds donated through GiveSendGo LLC or any of its affiliates or payment processors in connection with the "Adopt-a-Trucker" fundraiser.
6. Any and all funds held in the bank account of or controlled by Chris Garrah into which he is receiving donations by way of the "Adopt-a-Trucker" website or etransfers by way of the email address [REDACTED]
7. Any and all digital assets or cryptocurrency held in the following digital wallets of or controlled by Chris Garrah:

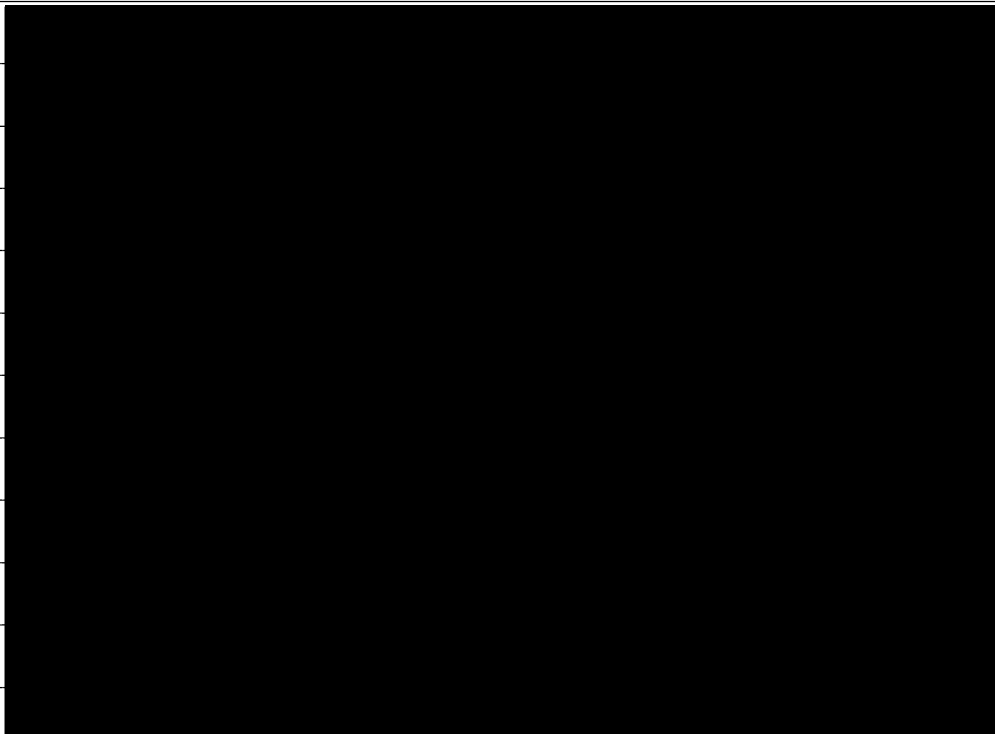
	No.	Wallet Address
BTC (Bitcoin)	1	[REDACTED]
ETH (Ethereum)	2	[REDACTED]

LTC (Litecoin)	3	
ADA (Cardano)	4	
XMR (Monero)	5	
ETC (Ethereum Classic)	6	

8. Any digital assets or cryptocurrency originating in the digital wallets identified in Item #7 which have been transferred to other digital wallets, as identified through the public ledger.

Benjamin Dichter & Nicholas St. Louis

9. Any and all digital assets or cryptocurrency held in the following digital wallets of or controlled by Benjamin Dichter and/or Nicholas St. Louis:

	No.	Wallet Address
BTC (Bitcoin)	1	
	2	
	3	
	4	
	5	
	6	
	7	
	8	
	9	
	10	
	11	
	12	

	13	
	14	
	15	
	16	
	17	

10. Any digital assets or cryptocurrency originating in the digital wallets identified in Item #9 which have been transferred to other digital wallets, as identified through the public ledger.

SCHEDULE “B”

Financial Institutions

TD Canada Trust

ATB Financial (a.k.a. Alberta Treasury Branches)

Fundraising Platforms/Websites

GoFundMe, Inc.

GoFundMe Ireland, Ltd.

GoFundMe Australia PTY Ltd.

GoFundMe New Zealand Limited

GiveSendGo LLC

Adopt-a-Trucker 

Digital Asset (Cryptocurrency) Platforms/Exchanges

Bull Bitcoin

TallyCoin

Bitbuy

Shakepay

Satoshi Portal

Bylls

Binance Smartchain

PancakeSwap

Nunchuk

Digital Asset (Cryptocurrency) Custodians

Greg Foss

Jeffrey Booth

Benjamin Tyler Perrin (a.k.a “BTC Sessions”)

Francis Pouliot

ZEXI LI
Plaintiff

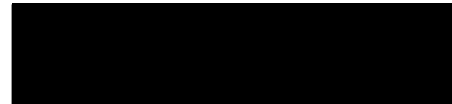
-and- CHRIS BARBER et al.
Defendants

Court File No. CV-22-00088514-00CP

ONTARIO
SUPERIOR COURT OF JUSTICE
PROCEEDING COMMENCED AT OTTAWA

ORDER

LENCZNER SLAGHT LLP
Barristers



Monique J. Jilesen (43092W)



Madison Robins (70110K)



Sarah Bittman (74913I)



Acting as Agent to Champ & Associates, Counsel for
the Plaintiff, Zexi Li